

Exhibit C

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

C.D.A., a minor child, and Mr. A.,
his father; and E.A.Q.A., a minor child,
and Mr. Q., his father,

Plaintiffs,

v.

The United States of America,

Defendant.

Civil Action No. 5:21-cv-00469

DECLARATION OF JOSHUA PICHARDO

I, Joshua Pichardo, declare the following to be true based on my personal knowledge, information acquired by me in the course of performing my official duties, information contained in the records of U.S. Customs and Border Protection ("CBP"), and information supplied to me by current CBP employees:

1. I am employed by CBP and my current position is Acting Special Operations Supervisor in Border Patrol's El Paso Sector, Texas. I have been employed with CBP for 15 years.
2. As a Supervisor, my responsibilities include managing alien processing and detention operations for the El Paso Sector.
3. As part of my duties, I am familiar with the Form I-213, Record of Deportable/Inadmissible alien.
4. A review of the e3 Module and associated applications showed that the individual referred to as Mr. A was convicted of illegal entry under 8 U.S.C. § 1325 and sentenced to a term of imprisonment of 15 days.
5. A review of the e3 Module and associated applications showed that the individual referred to as Mr. Q was referred for prosecution of illegal reentry under 8 U.S.C. § 1326.
6. Attached to this declaration are true and accurate copies of the I-213s for the following individuals, all of whom are plaintiffs in this case to my understanding:
 - a. Individual referred to as C.D.A.
 - b. Individual referred to as Mr. A.
 - c. Individual referred to as E.A.Q.A

d. Individual referred to as Mr. Q.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Joshua Pichardo